

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

EDGARDO NICOLAS MARTINEZ PEREZ

Debtors

Case No. 16-05934
Chapter 13

**OBJECTION TO PROOF OF CLAIM 1
FILED BY QUANTUM3 GROUP LLC
AS AGENT FOR ABSOLUTE RESOLUTION CORP**

TO THE HONORABLE COURT:

COMES NOW Debtor, represented by undersigned counsel, and very respectfully alleges and prays as follows:

1. On July 27, 2016, the Debtor filed a Voluntary Petition under Chapter 13 of the Bankruptcy Code.

2. On August 1, 2016, Quantum3 Group LLC as agent for Absolute Resolutions Corp filed Proof of Claim 1 as an unsecured claim in the amount of \$904.45 (hereinafter referred as the "POC"). Debtor hereby objects to the POC and in support thereof states as follows:

3. The POC is a personal loan and is based on writing. As such, the POC is in violation of FRBP 3001 (c)(1) and 3001 (c)(2)(A) in as much as it was not accompanying by copy of the writing and an itemized statement of the interest, fees, expenses, or charges incurred before the petition was filed. Additionally, the POC is in violation of 11 USC § 502 (a) & (b)(1).

4. For the foregoing is evident that the POC is facially defective since is not accompanied by the required minimum documentation.

5. Accordingly, the Debtor respectfully request from this Honorable Court to disallow the POC.

WHEREFORE, Debtor objects to the POC as filed and respectfully requests from this Honorable Court that in the event no additional documentation is provided, the POC be disallowed in its entirety.

NOTICE: Within thirty (30) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If a timely opposition is filed, the court will schedule a hearing as a contested matter.

CERTIFICATE OF SERVICE: I hereby certify that on this same date, I electronically filed the above document with the Clerk of the Court using the CM/ECF system, which will send notification, upon information and belief, of such filing to the following: Chapter 13 Trustee and the United States Trustee and to all CM/ECF participants. We also certify that this same date we have mailed by United States Postal Service the document to:

**QUANTUM3 GROUP LLC
AS AGENT FOR MOMA FUNDING LLC
PO BOX 788
KIRKLAND, WA 98083-0788**

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico this 28th day of August, 2018.

/s/ William Rivera Vélez
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